

Bradford J. Sandler, Esq. (NY Bar No. 4499877)
Ilan D. Scharf, Esq. (NY Bar No. 4042107)
Jason S. Pomerantz, Esq. (CA Bar No. 157216)
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 34th Floor
New York, New York 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777

Counsel to Plaintiff RDC Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK**

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Chapter 11

Case No. 20-20230 (PRW)

Advisory Trust Group, LLC, as trustee of the RDC
LIQUIDATING TRUST,

Plaintiff,

v.

GENSCO LABORATORIES, LLC,

Defendant.

Adv. Proc. No. 22-02029 (PRW)

SECOND STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff” or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc., and defendant, Gensco Laboratories, LLC (“Defendant”, and together with Plaintiff, the “Parties”), by and through their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the “Complaint”) against Defendant;

WHEREAS, the summons (the "Summons") was issued on February 4, 2022;

WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint;
and

WHEREAS, on March 2, 2022, the Parties entered into a stipulation (the "First Stipulation")
by which the time required for Defendant to answer the Complaint was extended through and
including April 15, 2022. The First Stipulation was approved by order entered March 4, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject
to Court approval, to further extend the time for the Defendant to answer the Complaint to and
including May 13, 2022.
2. All other terms set forth in the First Stipulation remain in full force and effect.

Respectfully submitted,

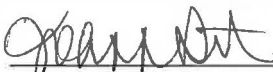
Dated: April 14, 2022

Dated: April 14, 2022

PACHULSKI STANG ZIEHL & JONES LLP

LIPPES MATHIAS

/s/ Ilan D. Scharf



Bradford J. Sandler (NY Bar No. 4499877)

Joann Sternheimer (NY Bar No. 2713501)

Ilan D. Scharf (NY Bar No. 4042107)

54 State Street, Suite 1001

Jason S. Pomerantz (CA Bar No. 157216)

Albany, NY 12207-2527

780 Third Avenue, 34th Floor

Telephone: (518) 462-0110, Ext. 1440

New York, NY 10017

Email: jsternheimer@lippes.com

Telephone: (212) 561-7700

Email: bsandler@pszjlaw.com

ischarf@pszjlaw.com

jspomerantz@pszjlaw.com

Counsel to Defendant Gensco Laboratories, LLC

Counsel to Plaintiff RDC Liquidating Trust

SO ORDERED:

DATED: _____, 2022
Rochester, New York

HON. PAUL R. WARREN